



Order Filed on November 12, 2020
by Clerk,
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

839764
PHELAN HALLINAN DIAMOND & JONES, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for Secured Creditor: Paramount Residential
Mortgage Group, Inc.

In Re:

Christopher A. Dawes

Case No: 17-29111 - SLM

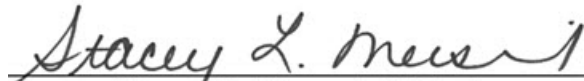
Hearing Date: 09/23/2020

Judge: Stacey L. Meisel

**CONSENT ORDER RESOLVING SECURED CREDITOR'S RESPONSE TO
DEBTOR'S MOTION TO REINSTATE STAY AS TO CREDITOR, PARAMOUNT
RESIDENTIAL MORTGAGE GROUP, INC.**

The consent order set forth on the following pages, numbered two (2) through four (4) is hereby **ORDERED**.

DATED: November 12, 2020


Honorable Stacey L. Meisel
United States Bankruptcy Judge

NJID 839764

PHELAN HALLINAN DIAMOND & JONES, PC

1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

856-813-5500

ATTORNEYS FOR PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

CHRISTOPHER A. DAWES

Debtor

CASE NO. 17-29111 - SLM

CHAPTER 13

CONSENT ORDER RESOLVING
SECURED CREDITOR'S RESPONSE TO
DEBTOR'S MOTION TO REINSTATE
STAY AS TO CREDITOR, PARAMOUNT
RESIDENTIAL MORTGAGE GROUP, INC.

HEARING DATE: 09/23/2020

This Consent Order pertains to the property located at 1414-16 Frances Lane, Plainfield, NJ 07062, mortgage account ending with "5388";

THIS MATTER having been brought before the Court by Michelle Labayen, Esquire attorney for debtor, Christopher A. Dawes, upon the filing of a Motion To Reinstate Stay as to Creditor, Paramount Residential Mortgage Group, Inc., Paramount Residential Mortgage Group, Inc. (hereinafter "**Cenlar FSB**") by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed a Response to the Motion To Reinstate Stay and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

IT IS ORDERED as follows:

1. The Automatic Stay as to Cenlar FSB is hereby **REINSTATED**.
2. The debtor is in post-petition arrears to the secured creditor and is due for **January 1, 2020** payment @ **\$1,346.21** per month, with **\$340.91** in debtor's suspense.
3. The debtor shall bring account post-petition current and tender the sum of **\$13,121.19** (10 payments @ \$1,346.21, less funds in suspense @ \$340.91) no later than **October 31, 2020**;
3. The debtor shall resume making regular post-petition pmts to Cenlar FSB effective **November 1, 2020**.

4. Payments to the Secured Creditor shall be made to the following address(es):

Regular Monthly payment:

Cenlar FSB
Attn: BK Department
425 Phillips Blvd.
Ewing, NJ 08618

Cure payments:

Cenlar FSB
Attn: BK Department
425 Phillips Blvd.
Ewing, NJ 08618

5. In the event of Default:

- (a) Should the Debtor fail to make any of the above captioned payments, or if any regular monthly mortgage payment commencing after the cure of the post-petition delinquency is more than thirty (30) days late, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and Debtor's attorney and the court shall enter an Order granting relief from the Automatic Stay
- (b) In the event the Debtor converts to a Chapter 7 during the pendency of this bankruptcy case, the Debtor shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtor fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and Debtor's attorney and the court shall enter an Order granting relief from the Automatic Stay
- (c) This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay


6. Award of Attorneys' Fees: Movant reserves its right to file a Post-Petition Fee Notice for fees incurred in connection with filing Certification of Default and Response to debtor's Motion to Reinstate Automatic Stay.

The undersigned hereby consent to the form,
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC
Attorneys for Secured Creditor:
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, INC.

/s/ Andrew Spivack

Andrew Spivack, Esq.
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Michelle Labayen, Esquire
Attorney for debtor

Dated: _____

Dated: 10/7/2020